

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

4INTERNET, LLC)	
)	
Movant,)	
)	CIVIL ACTION NO.
vs.)	
)	
NYP HOLDINGS, INC.)	
)	
Respondent.)	

NOTICE OF MOTION TO COMPEL DISCOVERY
FROM NYP HOLDINGS, INC.

PLEASE TAKE NOTICE that upon the attached Memorandum of Law, the accompanying Declaration of Ryan L. Isenberg, sworn to January 6, 2021, and the exhibits attached thereto, Movant 4Internet, LLC (“4Internet”), by and through its counsel at Isenberg & Hewitt, P.C., hereby moves this Court for entry of an order pursuant to Fed. R. C. P. 45(g), 45(d)(2)(B)(i), and 37(a)(3)(B)(i)-(ii), compelling a corporate representative from NYP Holdings, Inc. (the “NY Post”) to appear for deposition in New York and the attendant production of pertinent documents, in connection with currently pending litigation before the United States District Court, District of Nevada, Robert Miller vs. 4Internet, LLC and John Does 1-10, No. 2:18-cv-02097-JAD-VCF, and awarding any further relief as the Court deems proper.

4Internet certifies that it has made good faith efforts to secure NY Post's compliance with 4Internet's duly served July 23, 2020 Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, without requiring court action, but such efforts have been unsuccessful.

This 6th day of January, 2021.

Respectfully Submitted,

/s/ Ryan L Isenberg

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